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Before the  
**FEDERAL COMMUNICATIONS COMMISSION**  
Washington, D.C. 20554

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FEDERAL COMMUNICATIONS COMMISSION  
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In the Matter of )  
 )  
Revision of the Commission's Rules ) CC Docket No. 94-102  
To Ensure Compatibility with )  
Enhanced 911 Emergency Calling Systems )

COMMENTS OF NORTEL NETWORKS  
ON E911 PHASE II AUTOMATIC LOCATION IDENTIFICATION REQUIREMENTS

I. INTRODUCTION

Nortel Networks Inc. ("Nortel Networks"), as a supplier of wireless carrier infrastructure, submits these comments in response to the request of the Wireless Telecommunications Bureau for additional comment on requirements for wireless E911 Phase II Automatic Location Identification ("ALI").<sup>1</sup> Nortel Networks supports the Commission's stated goal of enhancing emergency services by locating wireless 911 callers by latitude and longitude. These comments reflect Nortel Networks' views of actions that the Commission and industry should take to reach that goal.

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<sup>1</sup> See CC Docket No. 94-102, Public Notice, DA 99-1049 (rel. Jun. 1, 1999) (the "Phase II Notice").

## II. GENERAL STANDARDS AND FUNDING ISSUES

Nortel Networks urges the Commission to weigh carefully the development of ALI standards for Public Safety Answering Points (“PSAPs”) as it develops rules in this proceeding. Nortel Networks supports providing wireless carriers the maximum flexibility in selecting different options to provide ALI. However, it is extremely important that these different systems use a single technical standard for the information delivered to PSAPs from carriers. Because PSAPs have very limited financial resources, it is unlikely that they can accommodate many different types or formats of information from multiple carriers in their 911 areas. A standardized format will drive the solution costs down and thereby maximize these limited financial resources.

The standards development process for ALI is complex, and successful, timely completion of that process is essential for availability of E911 Phase II solutions by October 1, 2001. To provide maximum flexibility for carriers in the selection of different options for offering ALI, it is imperative that these different systems use the ALI transport data protocols currently in standards development to convey the position information to the PSAP host system. At the same time, standards are being developed for ALI implementation internal to carriers’ networks, and the successful adoption and use of those standards also are critical to meeting the goals of E911 Phase II. Any failure by ALI system providers to participate in and adhere to the ALI standards currently in development will jeopardize the planned October 1, 2001 implementation date for wireless ALI.<sup>2</sup> Nortel Networks is actively engaged in ANSI E911 standards groups such as TR45 and T1P1. Nortel believes these forums can be relied upon to develop the needed consensus-based industry standards.

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<sup>2</sup> *See id.*

Nortel Networks believes that wireless carriers should have the flexibility to deploy the type of ALI technology that best serves the topography of their service areas and their subscribers' needs. For example, if carriers are not able to choose the most economical 911 solution for their areas and users, their ability to provide such service will be hampered, contrary to the universal service goals of the Communications Act. Particularly affected may be rural carriers who do not have sufficient user density to warrant the multiple-site coverage necessary for some ALI technologies.

When crafting rules for E911 Phase II implementation, the Commission should consider PSAP funding issues. The deployment of E911 Phase I has been seriously delayed due to inadequate funding for PSAPs.<sup>3</sup> Funding for E911 Phase II is not progressing to pay fully for the necessary Phase II solutions.<sup>4</sup> To limit the effect of this funding issue, wireless carriers should have maximum flexibility to select the ALI solution that they believe offers the best combination of Phase II compliance and economic soundness for their service territories.

### III. STANDARDS FOR HANDSET-BASED SOLUTIONS

Nortel Networks is providing the capability to transport ALI data in wireless carrier infrastructure that it designs and provides. As noted above, Nortel Networks is actively engaged

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<sup>3</sup> See CC Docket No. 94-102, Public Notice, *Commission Seeks To Facilitate Wireless E911 Implementation And Requests A Report*, FCC 99-132 (rel. Jun. 9, 1999) at 3 ("recent filings in the record and other sources of information reveal the pace for [Phase I] implementation is very slow").

<sup>4</sup> See *id.* at 4.

in standards organization efforts to develop the ALI data transport protocol and related standards.<sup>5</sup>

As AirTouch has noted, handset-based solutions may offer valuable economic and technical alternative methods for determining ALI.<sup>6</sup> Nortel Networks supports the availability of such options, which may be important in certain situations, such as providing service to rural and less densely populated areas of the United States. Nortel Networks also agrees with AirTouch that proponents of several of the proposed methodologies, whether network-based or handset-based, have overstated the commercial availability of their solutions.

Accordingly, Nortel Networks believes that the Commission should establish an alternative phased implementation schedule in order to permit the efficient deployment of handset-based ALI solutions.<sup>7</sup> Nortel Networks agrees in principle with SnapTrack and APCO that a phased approach is required. The Commission should examine carefully the proposed implementation schedules to ensure that they provide adequate time for satisfactory development and deployment of handset-based solutions.

#### IV. CONCLUSION

Nortel Networks supports the public safety goals of the Commission's E911 policies. Nortel Networks urges the Commission to consider the critical roles of ALI standards development and PSAP funding in achieving its goals. In doing so, the Commission should

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<sup>5</sup> Nortel Networks does not presently manufacture wireless handsets.

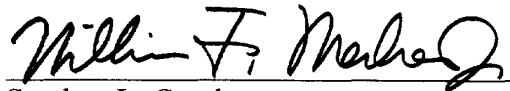
<sup>6</sup> See Reply of AirTouch Communications, Inc., Petition of Waiver of Section 20.18(e) of the Commission's Rules, CC Docket 94-102 (filed Feb. 22, 1999).

<sup>7</sup> See Phase II Notice at 3-4.

ensure that wireless carriers have maximum flexibility in selecting different options to provide ALI. The Commission should establish a reasonable alternative phased implementation schedule for the efficient deployment of handset-based ALI solutions.

WHEREFORE, Nortel Networks respectfully requests that the Commission take action in this important proceeding consistent with these comments.

Respectfully submitted,



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